

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOUREY NEWELL and FELIPE  
MACHADO, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

RECREATIONAL EQUIPMENT, INC., a  
Washington company,

Defendant.

Case No. 2:19-cv-00662

**DECLARATION OF ANTHONY  
TODARO IN SUPPORT OF  
RECREATIONAL EQUIPMENT,  
INC.'S MOTION TO DISMISS**

I, Anthony Todaro, hereby declare as follows:

1. I am a partner at DLA Piper LLP (US) and counsel of record for defendant Recreational Equipment, Inc. ("REI") in the above-captioned action. I submit this declaration in support of REI's Motion to Dismiss. I have personal knowledge of the facts contained in this declaration, and I am competent to testify as to them.

2. Attached as **Exhibit 1** is a true and correct copy of REI's Bylaws, dated May 1, 2017.

3. Attached as **Exhibit 2** is a true and correct copy of the dividend statement sent to REI members dated on or about March 2017.



**CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties or their counsel of record.

Dated this 30th day of May, 2019.

s/ Alicia Morales

Alicia Morales, Legal Practice Specialist

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